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OKLAHOMA CITY, OK 73118

June 24, 2013

EPA Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202

Re: "Test Wells"  
Rogers County, Pawnee County, and Okmulgee County, OK

Ladies and Gentlemen:

Please consider this a request for records and information under the freedom of information act. I sent a letter to you and others on April 30, 2013 concerning the drilling of test wells in Oklahoma and the lack of regulation and supervision of the drilling, operation and plugging of test wells. I have not received any response from you.

Oklahoma has been granted primacy based upon its compliance with the federal law in its underground injection program. Under the federal statutes and guidelines, is Oklahoma required to regulate and supervise the drilling of test wells? While the term "test well" has not been defined by the OCC rules and regulations, the term "test well" as being applied to current cases is a well that is not drilled with the intent to produce oil or gas, but with the intent to be used only for testing purposes. I do not know how the Oklahoma program can be in compliance with federal law when there is a class of wells being drilled that penetrate state waters and common sources of supply with no regulation. In order to control and contain water being injected into the underground formations, you have to know what wells have been drilled and the information about what was done with and to the well and plugging of the well. If this was an isolated instance, it might be ignored. But, in Oklahoma, there are at least three known sites where this is or has occurred and hundreds of undocumented wells have been drilled and plugged.

Please provide any letters, records or documents that relate to or discuss the regulation of test wells as defined above or my prior letter of April 30, 2013

Sincerely,



Richard K. Goodwin

June 24, 2013

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CC: Senator Clark Jolley  
2300 N. Lincoln Blvd., Room 425  
Oklahoma City, OK 73105

Representative Randy Grau  
2300 N. Lincoln Blvd., Room 423  
Oklahoma City, OK 73105

E. Scott Pruitt, Esq.  
Oklahoma Attorney General  
313 NE 21st St.  
Oklahoma City, OK 73105

Senator Jim Inhofe  
205 Russell Senate Office Building  
Washington, DC 20510

Senator Tom Coburn  
172 Russell Senate Office Building  
Washington, DC 20510

Congressman James Lankford  
228 Cannon House Office Building  
Washington, DC 20515